

Federal Communications Commission
Comcast v. NBC Universal
April 28, 2010

To Whom It May Concern:

I am writing in regards to the Comcast Corp.'s acquisition of NBC Universal that is under consideration. The marriage between the country's largest cable company and residential broadband provider, and one of the world's leading media and entertainment companies in the development, production, and marketing of entertainment, news, and information to a global audience, provides the basis for issues to be immediately addressed. The combination would make it one of the largest media mergers in our nation's history, alongside the partnership venture of AOL and Time Warner in 2000. The creation of this mega media conglomerate could set forth a series of possible problematic behavior that could stand to destroy our freedom, our culture, our economy and most importantly our democracy as a whole. Or on the other hand, have enough power to give America access to reshape the world with positive democratic influence through cultural imperialism.

The result of the consolidation of assets between these two corporate powerhouses would be the formation of a front running media conglomerate that would umbrella over theme parks, movie studios, professional athletic events and teams, MSNBC news, Hulu.com, etc. as well as everything that Comcast Cable brings to the table. This would be a conglomerate that would hold, with little to no government regulation, an unprecedented amount of control over content distribution and content creation units. With the power to influence more people than ever, essentially this merger could create an environment that allows for monopolistic competition and behavior. Comcast has strategically avoided a true monopoly by separating Comcast cable's business interests.

Comcast and NBC Universal released a joint statement citing that the new venture would not include Comcast's cable business. Comcast has created a new entity called Comcast Entertainment Group that will "house Comcast's interest in the joint venture and will stand alongside Comcast Cable." This move by this massive media merger has created an oligopoly, which if managed correctly is understandable for building a platform for legal framework and gaining control over the internet.

The Telecommunications Act of 1996 was designed to further open up markets to competition by removing unnecessary regulatory barriers to entry. However, the deregulations have led to a concentration of media ownership with fewer broadcasters competing in regional markets and the elimination of many local, independent and alternative media outlets. This merger eliminates the critical competition that normally occurs among content distributors such as Comcast, content programmers such as NBC, and content producers such as Universal Studios. This combination without a doubt positions the media conglomerate to have the market power to gouge its competitors.

Runaway media consolidation has already harmed the average citizen and general public. For example, When NBC bought Telemundo in 2001, it promised to improve local news coverage. Instead, it cut the local newscasts of Telemundo stations in multiple cities with a significant Latino population such as San Antonio, San Jose and Phoenix. In addition, Comcast has made no promises to change that or to improve news coverage at Telemundo stations.

If the proper regulations are not enforced by government; localism, diversity and competition in modern mass media stands to disappear forever.

The expanded control over the public's access to information will ultimately lead to the limitation of the public's access to alternative and independent sources of information which is a necessity for ensuring a well-functioning democracy. The merge raises antitrust issues as well as the most important legal argument within this current media consolidation crisis; our rights as citizens. We the People per our constitution are granted rights. A merger like this could openly and specifically interfere with the First Amendment of our Bill of Rights. Freedom of Speech, Press, Religion and Petition. As stated by our country's Supreme Court in 1969, "It is the purpose of the First Amendment to preserve an uninhibited marketplace of ideas in which truth will ultimately prevail, rather than to countenance monopolization of that market, whether it be by the government itself or a private license." During an assembly at the House Commerce Committee's subcommittee on the Internet, Mark Cooper of the Consumer Federation of America stated the following about the Comcast and NBC Universal merger, the merger "has so many anticompetitive, anticonsumer, and antisocial effects that it cannot be fixed. Comcast's claim that FCC oversight will protect the public is absurd."

As a citizen of the United States I am forced to question the integrity of this union in regards to whom and what interests benefit the most, big business or the people. I can find no evidence that provides me with anything other than the American people suffering from this union. I am in total opposition of the merger.

With diminishing competition, the danger of collusion, the probability of more anticompetitive conduct will only grow. Therefore, it is hard to understand how this merger happened as well as creates general concern for the public, who stand to be directly affected by the shrinking of consumer choice, the rise in prices, the loss of more jobs, and the immediate loss of culture and structure to society.

Media consolidation has proved to directly coincide with an increase of violence and sexuality on mass mediums such as television and radio, which will inevitably filter to the internet. Resulting from the pressure placed upon reaching the bottom line, the programming decisions become more

commercialized and much less receptive, or capable, of catering to the most important needs, the needs of local communities. The demands for business survival as a result, encourages the development, production, distribution and broadcast of cheap content that guarantees ratings through the shock appeal of sex, violence, and sensationalism.

As a publicist, I am extremely aware of the power and influential possibilities that are openly accessible to very few. If one specific media conglomerate is controlling every aspect of the information that most Americans are receiving, there is opportunity for hegemony over the entire nation. If this power falls into the wrong hands, it is inevitable that we will self destruct as a culture and as a country. If one centralized conglomerate controls all of the content created, determined to be the truth, distributed and accessible through every mass media medium - provided through the synergy capabilities, as well as maintain the control to limit accessibility to alternative sources, that conglomerate, or monopoly, controls the world of each person it reaches.

Technically, "We the People" agreed to provide the government the power to control these issues as deemed our right per the United States Constitution. At no point have we voted and agreed on allowing a mega media conglomerate act as god to benefit their bottom-line. It is time to step up together and control our future.

The future of the media will determine the future of every American, if not every living being. As our representatives, you must push for reform and regulate these actions in a democratic fashion. Inform and educate the public about the truth of what is at stake here, disclose all information with us regarding this issue and all issues moving forward, as it should be. Together as communities, states, and a nation as one ? we will determine what best fits our needs and have our elected representatives in government act on behalf of our best interest.

I feel it is our right, as American citizens, to know how Comcast and NBC Universal as well as the FCC can ensure that this mega media conglomerate that has formed will be regulated. We have the right to know every detail from all sides, to ensure an informed and educated vote by the people for reform and regulation. If access to informational resources are limited, and the information that is available has the capability of being manipulated and controlled, as a nation we are left vulnerable.

If this issue is not addressed and controlled immediately, the American people will indeed suffer.

Thank you,

Cynthia M. Salarizadeh

